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AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON
DEPUTY

IN THE UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF

VICKI CHANG,

Plaintiff,

v.

ANDREW VANDERWIELEN, BRIAN HUNT, JANE GUREVICH, EDWARD COLLINS, RIDDI KOTHARI, and THE CITY OF SEATTLE, a municipal corporation

Defendants.

22-CV-

13 GKV

NO.

COMPLAINT FOR DAMAGES

Plaintiff Vicki Chang, pro se, alleges as follows:

I. Parties, Jurisdiction, and Venue

1.1 Plaintiff. Plaintiff Vicki Chang resides in Seattle, King County, Washington.

1.2 Defendant. Defendant Andrew Vanderwielen was employed by Washington State as a Washington State Trooper at all times material to this case. He is a resident of the State of Washington. All of his actions in this case were in the course and scope of his duties as a Washington State Trooper. Defendant Vanderwielen is sued in his individual capacity.

1.3 Defendant. Defendant Brian Hunt was employed by the City of Seattle as a police officer at all times material to this case. He is a resident of the State of Washington. All of his actions in this case were in the course and scope of his duties as a Seattle Police Department Officer. Defendant Hunt is sued in his individual capacity.

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VICKI CHANG, PRO SE
4216 37th AVE S
SEATTLE WA 98118

1 1.4 Defendant. Defendant Jane Gurevich was employed by the University of
2 Washington as a security guard at all times material to this case. She is a resident of the State of
3 Washington. All of her actions in this case were in the course and scope of her duties as a
4 security guard at UW-Harborview. Defendant Gurevich is sued in her individual capacity.

5 1.5 Defendant. Defendant Edward Collins was employed by Washington State as a
6 Washington State Trooper at all times material to this case. He is a resident of the State of
7 Washington. All of his actions in this case were in the course and scope of his duties as a
8 Washington State Trooper. Defendant Collins is sued in his individual capacity.

9 1.6 Defendant. Defendant Riddhi Kothari, DO was employed by the University of
10 Washington as a doctor or medical resident at all times material to this case. She is a resident of
11 the State of Washington. All of her actions in this case were in the course and scope of her duties
12 as a doctor or medical resident at UW-Harborview. Defendant Kothari is sued in her individual
13 capacity.

14 1.7 Defendant. Defendant City of Seattle is a municipal corporation organized under
15 the laws of the State of Washington.

II. Jurisdiction

17 2.1 This court has personal and subject matter jurisdiction and venue is appropriate.

III. Summary of Facts

19 3.1 On January 6, 2018, Plaintiff returned to her residence in the evening to discover
20 that the powerline and power mast had been severed, causing her residence to be without power,
21 heat, or hot water. Plaintiff strongly suspected the cause of this property damage was
22 construction company Jabooda Homes which was doing construction on the site adjacent to her
23 to the north and had engaged in other activities that involved intentional property damage to her
24 residence prior to this incident. Four months later, Seattle City Light would catch Jabooda
25 Homes cutting plaintiff's powerline with a backhoe, causing an approximately 3 hour power
26 outage according to Seattle City Light. Plaintiff was experiencing significant physical and
 mental distress as a result of this incident, and had potential problems including but not limited

1 to hypothermia, a panic attack, nervous breakdown, and being really disoriented. She called 911
 2 to make a police report about this incident and go to the ER room due to the problems she was
 3 experiencing.

4 Plaintiff arrived in the UW Harborview ER room via ambulance and was checked in, but
 5 was not allowed to see a doctor even if she was experiencing serious mental and physical health
 6 issues that other doctors and medical professionals, including but not limited to Kaiser
 7 Permanente Consulting/Advice nurses, Kaiser Permanente Urgent Care Doctors, Swedish
 8 Emergency Room, Ob/Gyn, Psychiatrists and other doctors, and King County Public Health
 9 Nurses have all advised plaintiff, including in writing, are issues where it is important to seek
 10 medical attention in an Emergency Room setting and would require that she be checked out by a
 11 medical professional and stay under observation.

12 Defendants WST Andrew Vanderwielen and Security Guard Jane Gurevich claimed
 13 patient was “flopping around” on the waiting room floor, thus needed to be forcibly discharged
 14 without being seen by a doctor, which several nurses and doctors above felt was extremely
 15 contrary to the correct medical response, since many ER room admits are not very able to
 16 communicate, walk themselves to the doctor, or flop around including but not limited to people
 17 who are experiencing heart attacks, epilepsy, strokes, psychosis, and other serious mental health
 18 issues and actually need to be seen by a doctor.

19 Defendant Vanderwielen demanded that plaintiff get into a wheelchair and wheeled her
 20 erratically into a metal detector, parking garage ticket machine, and the wall, frightening
 21 plaintiff. He claimed in the police report that he tried to stand plaintiff up but she “flopped” to
 22 the ground, but plaintiff recalls that he then body slammed her to the ground. UW Primary Care
 23 doctor Michelle Rappaport, MD, agreed on September 13, 2019 during an in office visit after
 24 watching UW security camera footage obtained through a public records request that Plaintiff
 25 did not flop or move to the ground voluntarily, but that Defendant Vanderwielen along with
 26 other security staff actually physically brought her to the ground, claiming in visit notes in
 writing that plaintiff “asks me to watch a video of the security footage, which shows her being

1 wheeled into the lobby by several security personnel, perhaps including a police officer. She
 2 stands up and is brought to the ground. We discuss that I am not qualified to give her an opinion
 3 regarding the level of force used... States she wants knee MRI .”

4 While plaintiff was lying prone on the ground and not resisting arrest or assaulting
 5 anyone in anyway, Defendant Gurevich leaned on and squished plaintiff’s knees a lot in security
 6 camera footage and Defendant Vanderwielen cut through exactly one of the two leather handles
 7 of her handbag with a knife, causing property damage to Plaintiff. Defendant Gurevich then
 8 falsely claimed plaintiff assaulted her while lying prone on the ground after the wheelchair
 9 incident by kicking her on the side several times in the police report causing plaintiff to be
 10 arrested and falsely imprisoned. Defendant Vanderwielen claimed he was a witness to this
 11 alleged assault of Defendant Gurevich in the police report.

12 Arresting officer Brian Hunt of Seattle Police Department then arrived and arrested
 13 plaintiff, claiming he “tried to get her side of the story”, which is pretty contrary to plaintiff’s
 14 recollection. Plaintiff was held for 2 days in jail with no attorney and mistreated in many ways,
 15 yet at no point did anyone at SPD attempt to get security camera footage from the UW which
 16 would demonstrate the falsity of Defendant Gurevich’s assault claim as well as Defendant
 17 Vanderwielen’s claim to witness this assault, his claims regarding the plaintiff flopping to the
 18 ground, which plaintiff is unsure of being any crime or reason for arrest, but rather something
 19 that would probably require immediate medical attention according to conversations with several
 20 medical professionals.

21 Plaintiff was given documents after discharge indicating no charges would be filed
 22 against her by the City currently, never informed about subsequent charges filed against her prior
 23 to the City of Seattle commencing a case against her for supposedly assaulting defendant
 24 Gurevich in February 2019, and subsequently arrested out on warrant in April 2019 for missing
 25 this hearing.

26 After discharge, on January 9, 2019, plaintiff was disoriented, mentally ill, and was
 admitted to the ER room again at Harborview ER, where the attending physician expressed
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1 concerns about plaintiff being gravely disabled, having circumstantial thought processes, and
2 possibly having a panic attack or being delusional and in need of further observation and care as
3 well as a prior history of anxiety and depression issues that Defendant Riddhi Kothari, DO had
4 access to through UW medical records as it was a diagnosis made there. Defendant Kothari
5 claimed plaintiff was in no serious distress including mental, and had plaintiff forcibly
6 discharged against what should be the correct and conventional medical treatment according to
7 many medical professionals. Plaintiff was then held for a longer period of time at King County
8 jail. Many medical professionals including but not limited to ER or urgent care doctors at
9 Swedish and Kaiser Permanente, ob/gyn at Swedish and Kaiser Permanente, consulting nurses at
10 the Kaiser advice line, and nurses at King County Public Health have urged that plaintiff call
11 911, go to the ER room, and probably needed further observation if she experienced the mental
12 health symptoms that defendant Kothari alleges plaintiff had in January 2019 on medical records.
13 Defendant Kothari also claimed plaintiff had hyperthermia, which is obviously the opposite of
14 what anyone competent would correctly diagnose (hypothermia) if plaintiff claimed she had
15 problems related to having her power being cut, no heat or hot water in January, and problems
16 with being exposed to extreme cold. Defendant Kothari incorrectly failed to take down plaintiff's
17 assertions she was sexually assaulted in King County jail after her false and wrongful arrest for
18 assaulting UW security guard Jane Gurevich. Plaintiff was not given any clothing during the
19 time she was in jail, nor any sanitary napkins or tampons even though plaintiff told them she had
20 her period and staff had groped her. Partially as a result of defendant Kothari's medical
21 malpractice, patient's conditions went untreated, worsened, and in April 2019, plaintiff was
22 declared mentally incompetent by ITA court.

23 Plaintiff has tried discussing these issues with the Defendant Vanderwielen's supervisor
24 WST Edward Collins who repeatedly insists that plaintiff "flopped" to the ground and thus
25 defendant Vanderwielen was justified in restraining plaintiff, using force to hold plaintiff to the
26 ground along with defendant Gurevich, personally injuring plaintiff, damaging her personal
property by cutting through exactly one of the two leather handles of her purse with a knife on
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1 camera, and assisting in filing a false assault charge against plaintiff, causing her to be arrested.
 2 Defendant Collins refuses to take any action against defendant Vanderwielen for his actions in
 3 January 2019 related to the plaintiff's complaint.

4 Plaintiff has also tried to discuss her complaints and other issues with SPD Officer Brian
 5 Hunt's behavior with the Office of Police Accountability, including asking why he would
 6 continue to be employed after the incident with Mr. Alley-Barnes, only to have them make
 7 plenty of offensive derogatory comments about African-American and Middle Eastern people
 8 and refuse to take any action on her complaint.

9 Plaintiff has also complained to UW Medicine via email with regards to Riddhi Kothari,
 10 DO, Jane Gurevich, and Andrew Vanderwielen, which refuses to take any action on plaintff's
 11 complaints.

12 3.2 Prior Histories of Misconduct. Defendants Vanderwielen and Hunt have previously been the
 13 subjects of other complaints of misconduct, including perjury for WST Vanderwielen and false
 14 arrest and assault for Sgt. Hunt. WST Trooper Vanderwielen is on the Brady List, a federally
 15 mandated list of problem police officers that have committed major acts of dishonesty on duty,
 16 for committing perjury in a DUI case. Brian Hunt has been involved in a civil lawsuit involving
 17 false arrest, assault, and civil rights violations including racially and/or nationally motivated
 18 violations filed against him by Maikoyo Alley-Barnes which resulted in a \$185,000 payout from
 19 the City of Seattle to settle this claim as well as other complaints against him, some of which
 20 appear to have resulted in civil cases being filed against him.

21 Plaintiff is unsure of whether the other defendants have been involved in complaints,
 22 claims against them, and/or activities involving assault, property damage, false imprisonment,
 23 malicious prosecution, slander, libel, medical malpractice, police misconduct, or civil rights
 24 violations involving race, national origin, disability status, and/or gender, but would like to find
 25 out during the discovery process.

26 3.3 Failure to Train and Discipline Defendant Collins has failed to train and discipline
 Defendant Vanderwielen, who was a Brady List police officer prior to Plaintiff encountering him
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1 for the first time in 2019 due to his perjurious actions. Many medical professionals have
2 expressed concerns to plaintiff about arresting, restraining, or not getting immediate medical
3 attention for someone in the ER room after they “flop” to the ground and point out Defendants
4 Vanderwielen, Gurevich, and Hunt all have probably gotten plenty of training to get immediate
5 medical attention for people like this instead of undertaking the actions that they did, including
6 falsely arresting, injuring, and damaging the personal property of the plaintiff.

7 3.4 Dismissal of Charges against Plaintiff Plaintiff was gravely disabled and mentally
8 incompetent at the time of this incident according to an ITA Court, thus charges against her were
9 dismissed. Additionally, plaintiff has UW security camera footage of this incident contradicting
10 Defendant Vanderwielen’s sworn testimony about this incident obtained through a public records
11 request.

12 3.5 Injuries and Damages. As a proximate result of the facts alleged above, Plaintiff
13 suffered physical injuries from the January 6-7 ER room incident involving Defendants
14 Vanderwielen, Gurevich, and Hunt, false arrest, and imprisonment, damage to her personal
15 property, continued and worsened mental and physical health problems, lost wages, emotional
16 distress, and damages to her property.

17 IV. Legal Causes of Action

18 4.1 The foregoing is alleged.

19 4.2 Defendants Vanderwielen, Gurevich, and the City of Seattle are liable to the
20 Plaintiff for the torts of assault, personal injury, and property damage.

21 4.3 Defendants Vanderwielen, Gurevich, Hunt, Kothari, and the City of Seattle are
22 liable to the Plaintiff for the torts of false arrest and false imprisonment, damage to her personal
23 property, lost wages, emotional distress, and damages to her property.

24 4.4 Defendant City of Seattle is liable to the Plaintiff for the tort of malicious
25 prosecution.

26 4.5 Defendant Kothari is liable to the plaintiff for medical malpractice.

1 4.6 Negligent Training and Supervision. Defendants Collins and the City of Seattle
2 are liable for damages which resulted due to their negligence in training and supervising
3 Washington State troopers and Seattle Police Department officers, including but not limited to
4 Defendants Vanderwielen and Hunt.

5 4.7 Civil Rights Violations Defendants Vanderwielen, Gurevich, Hunt, and the City of
6 Seattle are liable to the Plaintiff for violations of her civil rights proximately resulting from
7 excessive force, damage to and seizure of personal property, in violation of her Fourth and
8 Fourteenth Amendment Rights. The Plaintiff believes that this incident was possibly motivated
9 by race, national origin, and/or disability status and asks for damages under RCW 9A.36.083.

10 4.8 Civil Rights Violations Defendant Collins is liable to the Plaintiff for violations of
11 her civil rights for failing to adequately train, supervise, and discipline Defendant Vanderwielen,
12 who has a serious history of police misconduct and dishonesty, including perjury on duty, and
13 was a Brady List police officer prior to Plaintiff encountering him for the first time in January
14 2019. To the extent that Defendant Collins was callously indifferent, intentionally negligent, or
15 acted with reckless disregard to the rights of Plaintiff or other individuals in similar
16 circumstances and/or with similar conditions, Defendant Collins is liable for punitive damages,
17 including under RCW 9A.36.083.

18 4.9 Civil Rights Violations Defendant City of Seattle is liable to the Plaintiff for
19 violations of her civil rights to the extent that the failure to train, supervise, and discipline police
20 officers is a policy, practice, or custom of the City of Seattle.

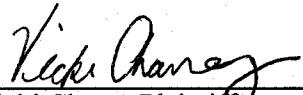
21
22 WHEREFORE, Plaintiff asks the court for relief as follows:

- 23 1. Damages and punitive damages in an amount to be proven at trial. Plaintiff seeks
24 punitive damages against all defendants except the City of Seattle.
25 2. Costs and reasonable legal fees; and
26 3. For such other relief as the court may deem just, equitable, or otherwise
 appropriate.

Complaint - 8

VICKI CHANG, PRO SE
4216 37th AVE S
SEATTLE WA 98118

1 DATED this 6 day of January 2022:



2 Vicki Chang, Plaintiff, pro se

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4 Address: 4216 37th Ave S, Seattle WA 98118
5 Telephone: (347)387-5677
6 Email: m210_vicki@yahoo.com

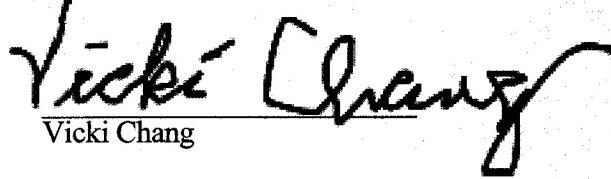
7 Certification

8 The undersigned Vicki Chang, being of legal age, states as follows:

9 I am the plaintiff in this action. I have read the foregoing Complaint and the factual
allegations in it are true and correct.

10 I certify under penalty of perjury under the laws of the State of Washington that the
foregoing is true and correct.

11 Dated this 6 day of January, 2022 at Seattle, Washington:


12 Vicki Chang
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